UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

SHEILA PORTER,)	
Plaintiff)	
V.) Civil Action No. 04-1193	5-DPW
ANDREA CABRAL, SUFFOLK COUNTY SHERIFF'S DEPARTMENT, SUFFOLK COUNTY, and CORRECTIONAL MEDICAL SERVICES, INC.))))	
Defendants))	

SHEILA PORTER'S NOTICE OF PARTIAL WITHDRAWAL OF MOTION TO COMPEL DISCOVERY FROM ANDREA CABRAL, SUFFOLK COUNTY SHERIFF'S DEPARTMENT AND SUFFOLK COUNTY

Plaintiff Sheila Porter ("Mrs. Porter") hereby provides notice that she is partially withdrawing her Motion to Compel Discovery from Andrea Cabral, the Suffolk County Sheriff's Department, and Suffolk County (collectively, "Suffolk Defendants") ("Motion to Compel") (Document 127). The parties have further conferred on the items contained in the Motion to Compel and counsel for the Suffolk Defendants has represented that she will provide Mrs. Porter with substantive responses to Document Request No. 57 and Requests for Admission Nos. 3, 5, and 6 this week. Based on and subject to this representation, Mrs. Porter withdraws all items contained in the Motion to Compel except for Document Request No. 8, requesting any documents related to FBI investigations that shed light on the Code of Silence, as reported on by the Stern Commission. *See* Motion to Compel, pp. 8-9.

Respectfully Submitted,

SHEILA J. PORTER

By her attorneys,

/s/ David Schumacher
Joseph F. Savage Jr. (BBO #443030) David S. Schumacher (BBO #647917) GOODWIN PROCTER LLP Exchange Place Boston, MA 02109-2881 617.570.1000

Dated: November 21, 2005

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